

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

MAY 24 2018

United States of America

v.

Gilberto BRAVO Jr.

David J. Bradley, Clerk of Court

Case No.

C-18-1092M-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 23, 2018 in the county of Kenedy in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. 841

Did knowingly and intentionally possess with intent to distribute, approximately 19.5 kilograms of cocaine (gross weight), to wit: a Schedule II Controlled Substance.

21 U.S.C. 846

Did knowingly and intentionally conspire with persons known and unknown and agreed together and with each other: to knowingly and intentionally possess with intent to distribute a controlled substance that is approximately 19.5 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attached Affidavit of HSI Special Agent.

☒ Continued on the attached sheet.
Complainant's signature

Jacob D. Moya, HSI Special Agent

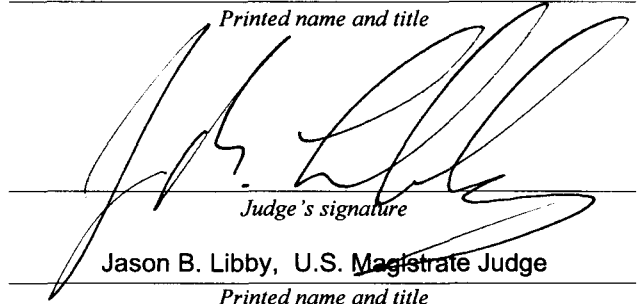
Printed name and title

Sworn to before me and signed in my presence.

Date:

May 24, 2018

City and state:

Corpus Christi, TX
Judge's signature
Jason B. Libby, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

On May 23, 2018, United States (U.S.) Border Patrol Agent (BPA) Justin Hayes was conducting normal inspection duties at the U.S. Border Patrol (USBP) Sarita, Texas Checkpoint along U.S. Highway 77 in Kenedy County, Texas and was focusing on northbound traffic.

BPA Hayes encountered a gray 2008 Infinity M35 sedan arrive at his assigned lane. BPA Hayes was able to identify the driver of the vehicle as Gilberto BRAVO Jr. (hereinafter referred to as BRAVO JR) and the passenger as Gilberto Raul BRAVO (hereinafter referred to as RAUL BRAVO). While HAYES was questioning BRAVO JR and RAUL BRAVO, BPA Gregorio Reyes asked BRAVO JR if he could look inside the trunk, to which BRAVO JR responded, "Yes". Once BPA Reyes completed his inspection of the trunk, he asked BRAVO JR if he consented to a search of his vehicle, to which BRAVO JR responded, "Yes". At this time, the vehicle was directed to secondary for further inspection.

In secondary, an assigned USBP narcotics detector dog positively alerted to the odor of a controlled substance emitting from the back of this vehicle. Once the trunk was opened, BPA Reyes was able to determine that the detector dog was positively alerting to the area in which two (2) speaker boxes were located. BPA Reyes noticed that the weight of the speaker box was not consistent with the weight of other speaker boxes he had previously encountered during the course of his duties.

Upon further inspection of the speaker boxes, BPA Reyes discovered what appeared to be a false wall or compartment inside the box. At this time, BPA Reyes drilled a hole in the side of a speaker box and as he pulled the drill back out of the box, he noticed a white powdery substance on the drill bit. Subsequently, USBP agents removed a total of eighteen (18) bundles weighing approximately 19.5 kilograms from within the two (2) speaker boxes. The bundles fielded tested positive for the properties of cocaine.

On this date, Homeland Security Investigations (HSI) and Drug Enforcement Administration (DEA) Special Agents responded to the USBP Sarita Checkpoint, introduced themselves to BRAVO JR, and explained the situation. HSI Special Agents Mirandized BRAVO JR utilizing the Homeland Security Investigations Miranda Warning Document in the English language. BRAVO JR stated he understood his rights and requested an attorney before answering any questions.

Similarly, HSI and DEA Special Agents introduced themselves to RAUL BRAVO. HSI Special Agents Mirandized RAUL BRAVO utilizing the Homeland Security Investigations Miranda Warning Document in the English language. RAUL BRAVO stated he understood his rights and agreed to answer questions without an attorney present.


During this interview, RAUL BRAVO stated that his father, BRAVO JR, has owned the 2008 Infinity M35 for approximately four (4) years. Furthermore, RAUL BRAVO informed agents that BRAVO JR had purchased the two (2) speaker boxes a few months before. RAUL BRAVO denied any knowledge or involvement in any criminal activity.

Database queries show that this 2008 Infinity M35 has approximately twenty (20) northbound crossings at the USBP Sarita Checkpoint and approximately three (3) northbound crossings at the USBP Falfurrias, Texas Checkpoint since May 31, 2017.

Additional database queries show that BRAVO JR is the registered owner of this 2008 Infinity M35 and an insurance document discovered inside the vehicle shows it is insured to BRAVO JR.

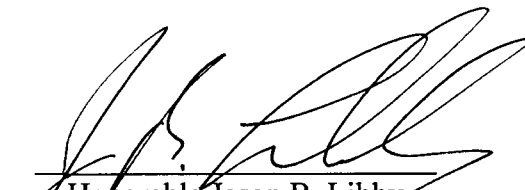
Furthermore, on July 18, 2017, the South Texas Specialized Crimes & Narcotics Task Force (STTF) conducted a southbound traffic stop on a 2008 Chrysler 300 along U.S. Highway 77 in Kleberg County, Texas. The STTF agent requested and received consent to search the vehicle which resulted in the discovery of \$241,379.00 USD (19 packages) of U.S. bulk cash currency concealed inside two (2) speaker boxes that were located in the trunk. BRAVO JR was the registered owner of this 2008 Chrysler 300.

AUSA Hugo Martinez was advised of the facts and approved prosecution of Gilberto BRAVO Jr. for violation of 21 USC 841, and 846, Possession with Intent to Distribute Cocaine, and Conspiring to Possess with Intent to Distribute Cocaine.



Jacob D. Moya, Special Agent
Homeland Security Investigations

SWORN AND SUBSCRIBED before me, this 24th day of May, 2018.



Honorable Jason B. Libby
United States Magistrate Judge